

### **REMARKS**

The Examiner rejected claims 2-3, 6, 9-16, 18, and 22-23 under 35 U.S.C. §102(e) as anticipated by U.S. 6,266,483 to Okada et al. (Okada). We respectfully disagree for at least the following reasons.

First, as background we note that the present claimed invention generally relates to systems and methods for testing navigational paths for digital paths through digital content. As described in the specification, identification data is extracted from a video sequence, and this identification is used to access an abstraction which is, in turn, compared with a test plan, allowing it to be determined whether the abstraction (and by extension the video sequence) is correct or as anticipated. This is expressed in claim 22 as follows:

22. An automated system for testing navigational paths through digital content comprising a first video sequence having associated identification data, the system comprising:

means to extract the identification data from the video sequence and to access, using the identification data, an abstraction, said the abstraction being associated with a raw content object from which the first video sequence was derived; and

a correlator to determine whether there is a correlation between the accessed abstraction and an anticipated abstraction of a test plan comprising a plurality of abstractions associated with respective raw content objects during authoring of the digital content.

In contrast, Okada is concerned with arranging content of different formats so that the content can be rendered irrespective of the format. Okada accomplishes this by using “management information” including, inter alia, “PGC information” and object information stored in “file management tables”. Okada does not mention testing navigational paths through digital content.

The Examiner referenced passages of the Okada patent which she believes discloses the features recited in claim 22. However, we submit that referenced passages to not, in fact, disclose the claimed features.

With regard to the “means to extract” of claim 22, the Examiner directs our attention to the following passages from Okada:

As shown in FIG. 10, the original PGC information 50 includes at least [sic] one of the cell information. The cell information 60 . . . specifies an object to be replayed, and a replay section of the object. Generally, the PGC information 50 records a plurality of cells in a certain sequence. This recording sequence of the cell information in the PGC information 50 indicates the sequence in which the objects specified in respective cells are replayed. (Col. 8, lines 24-31).

Based on the object ID (Object ID), the object information (VOBI) corresponding to the ID can be found. The object ID has a one-to-one correspondence to the movie object ID (M\_VOB\_ID) contained in the general information (M\_VOB\_GI) of the movie object information (M\_VOB\_I).

As described above, the object information corresponding to the cell information can be retrieved by using the type information (Type) and the object ID (Object ID). (Col. 10, lines 17-25)

These passages refer to an "object ID", which is contained within cell information within PGC information. The PGC information (or program chain information) defines a playback sequence and playback times for data to be played back from DVD-RAM. That is, it indicates a playback sequence of cells and may be user defined. However, the PGC information is not a video sequence, so these passages do not relate to extracting identification data from a video sequence.

With regard to the "correlator" of claim 22, the Examiner directs our attention to the following passages from Okada:

The original PGC information 50 contains the cell information 61, 62, 63, . . . in the order of playback. The cell information contains information corresponding to the object information (type and object ID) and the playback section information (Start and End) within the object. The playback section information shown in the cell can be converted to address information of the object substance through the access map in the object information. (Col. 14, lines 55-62).

The system controller 1902 first analyzes the type information stored in the cell information in the PGC information. When the type information is "M\_VOB", it means that the AV stream to be played is the stream recorded as the MPEG program stream. Next, the system controller 1902 refers to the ID of the cell information to find the corresponding movie object information (M\_VOBI) from the table (M\_AVFIT). The system controller 1902 then finds start address and end address of the AV data to be played according to the start time information (M\_VOB\_V\_S\_PTM) and end time information (M\_VOB\_V\_E\_PTM) contained in the movie object information, and T map. (Col. 18, lines 22-34).

But within these passages, we could find no reference to correlating, test plans, or abstractions of any kind. Okada does refer elsewhere to a file management table, but since this is not involved in testing, it does not correspond to a test plan.

We note that claims 18 and 23 also includes similar limitations to those discussed above in connection with claim 22 and thus similar arguments apply to those independent claims.

For the reasons stated above, we believe that the claims are in condition for allowance and therefore ask the Examiner to allow them to issue.

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Respectfully submitted,

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/Eric L. Prah/  
Eric L. Prah  
Registration No.: 32,590  
Attorney for Applicant(s)

Wilmer Cutler Pickering Hale and Dorr LLP  
60 State Street  
Boston, Massachusetts 02109  
(617) 526-6000 (telephone)  
(617) 526-5000 (facsimile)